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Attorneys for Eaton Corporation

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: Chapter 11  
DELPHI CORPORATION, et. al., Case No. 05-44481 (RDD)  
Debtors. (Jointly Administered)

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**EATON CORPORATION'S OBJECTION TO PROPOSED CURE AMOUNT**

Contract Counterparty: Eaton Corporation  
Contract No: D0550063186  
Debtors' Proposed Cure Amount: \$82,949.33

For its Objection ("Objection") to the Debtors' Proposed Cure Amount of \$82,949.33 (the "Proposed Cure") in respect of the proposed assumption of Contract No. D0550063186 (the "Contract"), Eaton Corporation ("Eaton") states as follows:

1. Eaton is an ongoing supplier to the Debtors of various automotive components and subcomponents pursuant to purchase orders and certain agreements, including the Contract.

2. Eaton has reviewed its books and records in respect of the Contract and the Debtors' Proposed Cure and has determined, subject to further, detailed investigation, that the Proposed Cure is incorrect in amount.

3. As set forth in the spreadsheet annexed hereto as Exhibit A, Eaton submits that the amount required to cure defaults under the Contract as required by Bankruptcy Code section 365(b) is \$93,689.51.

4. Eaton reserves its right to amend its cure calculation upon further investigation, and further reserves all of its other rights and remedies under the Bankruptcy Code and other applicable law.

WHEREFORE, Eaton respectfully requests that the Court establish \$93,689.51 as the amount required to cure defaults under the Contract as required by Bankruptcy Code section 365(b) and grant Eaton such other relief as the Court deems just and proper.

Dated: Cleveland, OH  
January 11, 2008

Respectfully submitted,

/s/ Stuart A. Laven, Jr.  
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**Certificate of Service**

The foregoing *Eaton Corporation's Objection to Proposed Cure Amount* was sent via regular U.S. Mail on January 11, 2008 to the following parties:

Honorable Robert D. Drain,  
United States Bankruptcy Judge  
One Bowling Green  
Room 632  
New York, NY 10004

Delphi Corporation  
5725 Delphi Drive  
Troy, MI 48098  
Attention: General Counsel

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Attention: Donald Bernstein and Brian Resnick

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Attention: Glenn M. Kurtz and Gregory Pryor

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District of New York  
33 Whitehall Street, Suite 2100  
New York, NY 10004  
Attention: Alicia M. Leonhard

/s/ Stuart A. Laven, Jr.

Eaton Aeroquip Mexico  
Delphi Claim Number 10971

9-Jan-08

